

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

May 29th 20 24
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

BRAIDEN F. WILSON, and
CHANDLER B. BENNETT,
Defendants.

NO. **CR 24 - 093 LK**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Possession of a Controlled Substance with Intent to Distribute)

On or about May 12, 2024, in King County, within the Western District of
Washington, BRAIDEN F. WILSON and CHANDLER B. BENNETT did knowingly
and intentionally possess, and aid and abet the possession of, with the intent to distribute,
a controlled substance, namely: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]
propanamide (fentanyl), a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a
mixture or substance containing a detectable amount of fentanyl.

1 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),
2 and Title 18, United States Code, Section 2.

3 **COUNT 2**

4 **(Unlawful Possession of a Machinegun)**

5 On or about May 12, 2024, in King County, within the Western District of
6 Washington, BRAIDEN F. WILSON and CHANDLER B. BENNETT did possess, and
7 aid and abet the possession of, a machinegun, that is: a black AR-15 type rifle with a
8 drop-in auto sear installed.

9 All in violation of Title 18, United States Code, Sections 922(o) and 2.

10 **COUNT 3**

11 ***(Unlawful Possession of Destructive Devices)***

12 On or about May 12, 2024, in King County, within the Western District of
13 Washington, BRAIDEN F. WILSON did knowingly possess destructive devices, that is,
14 a combination of parts designed and intended for use in converting any device into a
15 destructive device, specifically, an explosive bomb commonly known as a pipe bomb,
16 and from which such a destructive device may be readily assembled, which devices were
17 not registered to WILSON in the National Firearms Registration and Transfer Record.

18 All in violation of Title 26, United States Code, Sections 5861(d), 5845(a)(8), and
19 5845(f)(3).

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COUNT 4

(Unlawful Possession of Silencers)

On or about May 12, 2024, in King County, within the Western District of Washington, BRAIDEN F. WILSON did knowingly possess silencers, that is, several black metal cylinders, that were not registered to WILSON in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(7).

FORFEITURE ALLEGATION

The allegations contained in Counts 1-4 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, CHANDLER B. BENNETT and BRAIDEN F. WILSON shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense.

Upon conviction of the offense alleged in Count 2, CHANDLER B. BENNETT and BRAIDEN F. WILSON shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and ammunition that were involved in the offense.

Upon conviction of the offense alleged in Count 3, BRAIDEN F. WILSON shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, by way of Title 28, United States Code, Section 2461(c), any incendiary devices that were involved in the offense.

Upon conviction of the offense alleged in Count 4, BRAIDEN F. WILSON shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, by

1 way of Title 28, United States Code, Section 2461(c), any firearms that were involved in
2 the offense.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
4 any act or omission of the defendants,

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or,
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty;

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:

6 DATED: May 29, 2024

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8 *Signature of Foreperson redacted pursuant*
9 *to the policy of the Judicial Conference of*
10 *the United States.*

11
12 FOREPERSON

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14 
15 TESSA M. GORMAN
16 United States Attorney

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19 TODD GREENBERG
20 Assistant United States Attorney

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22 
23 CASEY S. CONZATTI
24 Assistant United States Attorney

25
26 
27 BRIAN WYNNE
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